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Attorneys for Defendants
CITY OF REDDING, JOE ROSSI, JAY GUTERDING, and
BRETT LEONARD

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

R.H., a minor, by and through her
guardian ad litem, Sheila Brown;
ESTATE OF ERIC JAY HAMES, by and
through its personal representative, Crystal
Dunlap-Bennett,

Plaintiff,

v.

CITY OF REDDING, a public entity; JOE
ROSSI, an individual; KIP KINNEAVY,
an individual; JAY GUTERDING, an
individual; BRETT LEONARD, an
individual; and DOES 5 through 20
inclusive,

Defendants.

Case No. 2:20-CV-01435-WBS-DMC

**STIPULATION AND ORDER TO EXTEND
DISCOVERY DATES**

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IT IS HEREBY STIPULATED, and respectfully requested, by and between Plaintiffs R.H., a minor, by and through her guardian ad litem, Sheila Brown, and ESTATE OF ERIC JAY HAMES, by and through its personal representative, Crystal Dunlap-Bennet (hereinafter, collectively “Plaintiffs”) and Defendants CITY OF REDDING, JOE ROSSI, KIP KINNEAVY, JAY GUTERDING and BRETT LEONARD (hereinafter, collectively “Defendants”) by and through their designated counsel, that:

WHEREAS, on July 17, 2020, Plaintiffs filed their Complaint (Dkt. No. 1);

WHEREAS, on August 10, 2020, Plaintiffs filed their First Amended Complaint (Dkt. No. 8);

WHEREAS, on September 14, 2020, Defendants City of Redding, Joe Rossi, Jay Guterding and Brett Leonard filed their Answer (Dkt. No. 10);

WHEREAS, on November 13, 2020, Defendant Kip Kinneavy filed his Answer (Dkt. No. 14);

WHEREAS, on November 16, 2020, the Court issued the Pre-Trial Scheduling Order (Dkt. No. 16);

WHEREAS, the Parties did proceed as best able by Zoom depositions, but have been delayed in retaining and completing discovery because of Covid;

WHEREAS, counsel for Defendants City of Redding, Joe Rossi, Jay Guterding and Brett Leonard, Mr. Dale Allen, and counsel for Plaintiffs, Mr. Neil Gehlawat, are completing expert depositions in a trial set for August 17, 2021 in Shasta Superior Court with Judge Stephen Baker further causing delays in completing discovery;

WHEREAS, this is the first request for an extension on the case management schedule and for the limited purposes of continuing discovery dates;

WHEREAS, the current discovery schedule is set as:

Discovery Cut-Off: (Inclusive of all expert depositions)	September 24, 2021
Expert Witness Disclosures:	July 30, 2021
Rebuttal Expert Witness Disclosures:	August 27, 2021; and

WHEREAS, the Parties met and conferred and agreed to extend discovery dates and set the case schedule as proposed below:

Discovery Cut-Off: October 15, 2021
(Inclusive of all expert depositions)

Expert Witness Disclosure: September 10, 2021

Rebuttal Expert Witness Disclosure: September 27, 2021

IT IS SO AGREED.

Dated: July 14, 2021

By: /s/ Neil K. Gehlawat

NEIL K. GEHLAWAT

Attorneys for Plaintiffs

R.H., a minor, by and through her guardian ad litem, Sheila Brown; ESTATE OF ERIC JAY HAMES, by and through its personal representative, Crystal Dunlap-Bennett,

Dated: July 14, 2021

By: /s/ Dale L. Allen, Jr.

DALE L. ALLEN, JR.

Attorneys for Defendants

CITY OF REDDING, JOE ROSSI, JAY GUTERDING, AND BRETT LEONARD

Dated: July 14, 2021

By: /s/ Gary G. Goyette

GARY G. GOYETTE

Attorney for Defendant

KIP KINNEAVY

IT IS SO ORDERED.

Dated: July 19, 2021



DENNIS M. COTA

UNITED STATES MAGISTRATE JUDGE

ALLEN, GLAESSNER, HAZELWOOD & WERTH, LLP
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